Miller, Amy

From: Miller, Amy
Sent: Friday, April 11, 2014 8:20 PM
To: Brian Johnson
Subject: Fw: Exide epa's stormwater inspection report
Attachments: Nonfiler - Exide Recycling - 02-16-2011 - Report - Delivered.pdf; Nonfiler - Exide Recycling - 02-16-2011 -Photo Log - Delivered.docx; Nonfiler - Exide Recycling - 02-16-2011 - Exhibit Log - Delivered.pdf

Hi Brian. I am on blackberry and can't find Paul Kewin's email. Here is one report I have a few more. I also need to go down to the records center for older stuff.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Wampler, David <Wampler.David@epa.gov>
Sent: Friday, April 11, 2014 4:04 PM
To: Miller, Amy
Subject: Exide

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Industrial Storm Water Inspection Report		
Entity: Exide Technologies (Exide)	WDID No. **Not Available**	Inspection Date: 2/16/2011
Facility Name: Los Angeles Recycling Facility	SIC Code: 3341 – Secondary Smelting and Refining of Nonferrous Metals 5093 – Scrap and Waste Materials	Receiving Water: Unknown by Facility Representatives
Facility Address: 2717 South Indiana Street, Vernon; Los Angeles County, California		
Facility Representatives/Titles: Ed Mopas (Environmental Manager, Exide); Vianey Mendez (Health and Safety Manager, Exide)		
Additional Persons Present: Carmelita Benitez (Air Quality Inspector II, South Coast Air Quality Management District)	Inspector(s): Scott Coulson (PG Environmental, LLC)	
Weather Conditions at the Time of the Inspection: Sporadic Precipitation		

Inspection Findings

On February 16, 2011, a U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, LLC (hereafter, EPA Contract Inspector) conducted an industrial storm water inspection of the above-referenced facility (hereafter, Facility or site). The inspection was conducted on behalf of EPA and at the request of the California Regional Water Quality Control Board, Los Angeles Region (hereafter, Regional Water Board), with respect to the California State Water Resources Control Board (SWRCB) Order No. 97-03-DWQ, National Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001 for Discharges of Storm Water Associated with Industrial Activities (the Permit). The EPA Contract Inspector held a closing conference at the conclusion of the inspection and reviewed the preliminary inspection findings with Mr. Ed Mopas (Environmental Manager, Exide) and Ms. Carmelita Benitez (Air Quality Inspector II, South Coast Air Quality Management District).

The EPA Contract Inspector was specifically tasked with conducting an inspection to provide the Regional Water Board, SWRCB, and EPA with information necessary to determine whether the Facility has a need for coverage under SWRCB Order No. 97-03-DWQ, NPDES General Permit No. CAS000001 for Discharges of Storm Water Associated with Industrial Activities.

Records Review

During the inspection, the EPA Contract Inspector held an office conversation with Mr. Mopas, who was hired in July 2008 and is responsible for overall environmental compliance at the Facility. Mr. Mopas provided a guide for lead acid battery recycling deliveries that indicates the Facility was originally established in 1929 by a former owner. GNB, Inc., whose name changed to Exide in 2001, and began operations in 1988. Mr. Mopas indicated, however, that he did not have any record that industrial storm water coverage had been obtained under SWRCB Order No. 97-03-DWQ.

Exide holds an industrial wastewater discharge permit (Permit No. 15725) with the County Sanitation Districts of Los Angeles County (LACSD) that includes the following: battery breakdown, Facility washdown, non-contact cooling water (not single pass), water softener regeneration, truck wash, employee handwash, respirator wash, blast and reverb wet air pollution controls, battery case classification and contamination, employee showers, and impounded storm water runoff. The industrial wastewater discharge permit specifies that wastewater producing operations are to be provided with pretreatment at Exide's Wastewater Treatment Plant (WWTP) and subsequently discharged to the sanitary sewer collection system for further treatment at the LACSD Joint Water Pollution Control Plant (JWPCP).

Exhibit 1 provides a site plan layout showing pertinent locations at the Facility. The EPA Contract Inspector observed a drainage channel that serves as the western border of the northern portion of the Facility (refer to Exhibit 1 and Photograph 1),

which subsequently flows south and bisects the southern portion of the Facility (refer to Exhibit 1 and Photograph 2). The outfall from the drainage channel to the Los Angeles River is located approximately 0.11 mile to the southwest.

During the inspection, the EPA Contract Inspector requested a piping schematic showing the Facility storm water drainage system and sanitary sewer system, including any sanitary sewer connections. Although these were not available at the time of the inspection, Mr. Mopas subsequently provided the EPA Contract Inspector with drawings that were originally prepared in the 1980's and partially revised in February 1998. The drawings show on-site drain inlets connected to a storm water retention pond, which is then pumped to the WWTP and provided with pretreatment.

As evidenced below, the drawings provided to the EPA Contract Inspector do not reflect the current pumping practices, piping configuration, or pretreatment system. Mr. Mopas explained that storm water no longer flows directly to the storm water retention pond. Instead storm water is directed to a central collection point located at the western corner of the central container storage building. There is currently a series of four storm water settling tanks (approximately 10,000 gallons each) that are used to feed storm water into the WWTP (refer to Exhibit 1 and Photograph 3). Mr. Mopas explained that when storm water flows are greater than the capacity available in the settling tanks, the excess storm water is directed from the settling tanks to the storm water retention pond (refer to Photographs 2 and 4). A pumping station is located near the northeast corner of the storm water retention pond (refer to Photograph 4), which Mr. Mopas indicated was used to pump impounded storm water from the retention pond to the WWTP. Upon request, an Exide WWTP operator provided the EPA Contract Inspector with recent pumping records showing the volume of storm water pumped from the retention pond to the WWTP (refer to Exhibit 2).

Facility Inspection

Exide conducts regulated industrial activity at the Facility as specified in Attachment 1 of the Permit, and further defined in Title 40 of the *Code of Federal Regulations* (CFR), Part 122, Subpart B, Section 122.26(b)(14) [40 CFR Part 122.26(b)(14)]. Upon request, Mr. Mopas provided the EPA Contract Inspector with documentation that lists the Facility's Standard Industrial Classification (SIC) Code as 3341 – Secondary Smelting and Refining of Nonferrous Metals (refer to Exhibit 3). The California State Department of Toxic Substances Control (DTSC) Envirostor database (refer to Exhibit 4), indicates that the Facility is a hazardous waste Facility operating in interim status "under Subtitle C of the Federal Resource, Conservation, and Recovery Act (RCRA)," also a regulated industrial activity as specified in Attachment 1 of the Permit.

The EPA Contract Inspector observed, during the inspection, additional regulated industrial activities that included recycling lead acid batteries to recover lead and plastic (refer to Photographs 5 and 6); activities that are categorized under SIC Code 5093 – Scrap and Waste Materials. Mr. Mopas explained that lead acid batteries are processed using a hammer mill and the lead is separated from the plastic. The secondary lead smelter is then used to refine the lead back to a pure form as lead ingots, the finished salable product. Based on these activities and SIC Codes, the entire Exide site is an industrial facility as specified in Attachment 1 of the Permit.

The following section of the report documents the proximity and relationship between potential pollutant sources and corresponding drainage features as they relate to the potential to discharge storm water. Mr. Ed Mopas (Environmental Manager, Exide) and Ms. Carmelita Benitez (Air Quality Inspector II, South Coast Air Quality Management District) accompanied the EPA Contract Inspector during the Facility Inspection.

1. The EPA Contract Inspector observed, during the inspection, equipment and pavement washing activity outside the blast furnace feed room in an area of the Facility that Mr. Mopas referred to as the "North Yard" (refer to Photographs 7 and 8). Wash water was flowing through a scrap iron stockpile (refer to Photograph 9), along the Union Pacific and Santa Fe Railroad tracks, and toward the railway exit along South Indiana Street (refer to Exhibit 1). Because the railway is traveled by railcars which are loaded with finished product at the loading dock adjacent to the blue lead warehouse (refer to Exhibit 1), this railway itself is also an area of industrial activity. Although a berm and trench drain were present along the railway exit, there was a potential for locomotive and railcar contact with the wash water accumulated along the tracks, and subsequent tracking onto South Indiana Street (refer to Photographs 10 and 11). Rail

traffic and subsequent tracking were not observed during the inspection. Due to the lack of rail traffic, wash water was observed flowing into the trench drain adjacent to the railway exit along South Indiana Street (refer to Photographs 12 and 13). Based on the drawings provided and reviewed after the inspection, the EPA Contract Inspector could not verify that this trench drain is connected to the WWTP collection system.

2. The EPA Contract Inspector observed, during the inspection, that the concrete curb along the drainage channel in the North Yard was damaged (refer to Photographs 14 and 15). Specifically, cracks were present in the concrete curb at multiple locations, possibly compromising the structural integrity of the curb (refer to Photographs 16 through 18). Due to the damaged concrete curb, there was a potential for storm water to pass through the curb and enter the adjacent drainage channel which serves as the western border of the North Yard.

3. The EPA Contract Inspector observed, during the inspection, that storm water had been tracked outside the Facility at the 26th Street entrance/exit located in the North Yard (refer to Exhibit 1). Mr. Mopas explained that the 26th Street entrance/exit is used to transport finished product, and that truck traffic is not allowed in the area to the west of the Raw Material Processing System (RMPS) building (refer to Exhibit 1). Truck traffic was observed exiting the Facility through an area of standing water (refer to Photographs 19 and 20), and subsequently tracking storm water onto 26th Street (refer to Photographs 21 and 22).

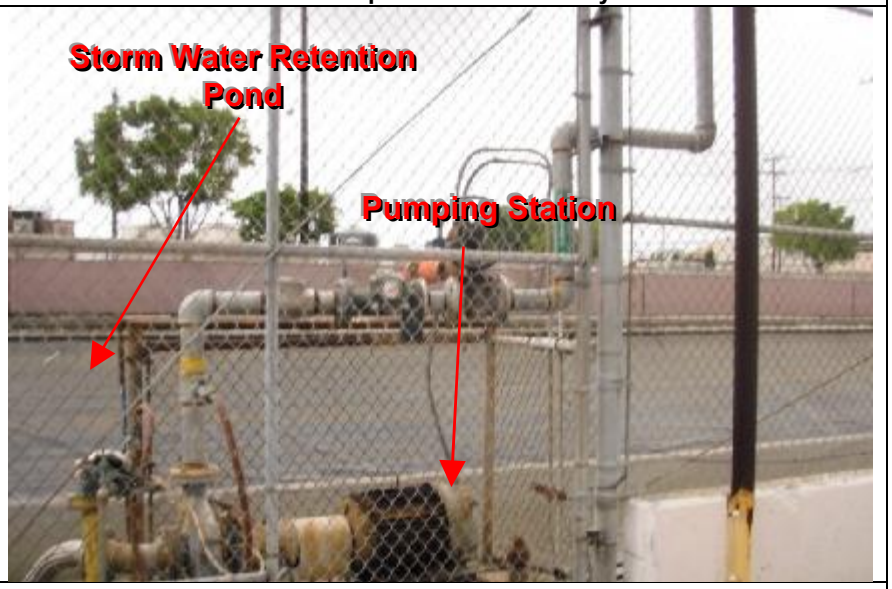
4. The EPA Contract Inspector observed, during the inspection, two vehicle and equipment wash facilities. A mobile equipment (e.g., forklift) wash rack is located to the west of the Mobile Equipment Maintenance Garage in the West Yard (refer to Exhibit 1 and Photographs 23 through 24). In addition, a vehicle wheel wash facility was present northeast of the Bandini Boulevard entrance/exit in the West Yard (refer to Photographs 25 through 26). Mr. Mopas explained that the vehicle wheel wash facility was approximately one year old, and that scale house staff ensure that vehicles use the wheel wash prior to exiting onto Bandini Boulevard. The industrial wastewater discharge permit (Permit No. 15725) with LACSD indicates that truck wash water is permitted for pretreatment at the WWTP. However, based on the drawings provided and reviewed after the inspection, the EPA Contract Inspector could not verify that these two vehicle and equipment wash facilities are connected to the WWTP collection system.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011

Photograph 1 – View facing southwest at drainage channel that serves as the western border of the northern portion of the Facility.

Photograph 2 – View facing southwest at drainage channel that bisects the southern portion of the Facility.

Photograph 3 – Series of four storm water settling tanks (approximately 10,000 gallons each) that are used to feed storm water into the WWTP.



Photograph 4 – A pumping station located near the northeast corner of the storm water retention pond.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011

Photograph 5 – View of batteries being placed in the battery dump bin from the battery recycling delivery dock.

Photograph 6 – View of battery dump bin from the battery recycling delivery dock.

Photograph 7 – View facing north at equipment and pavement washing activity outside the blast furnace feed room.

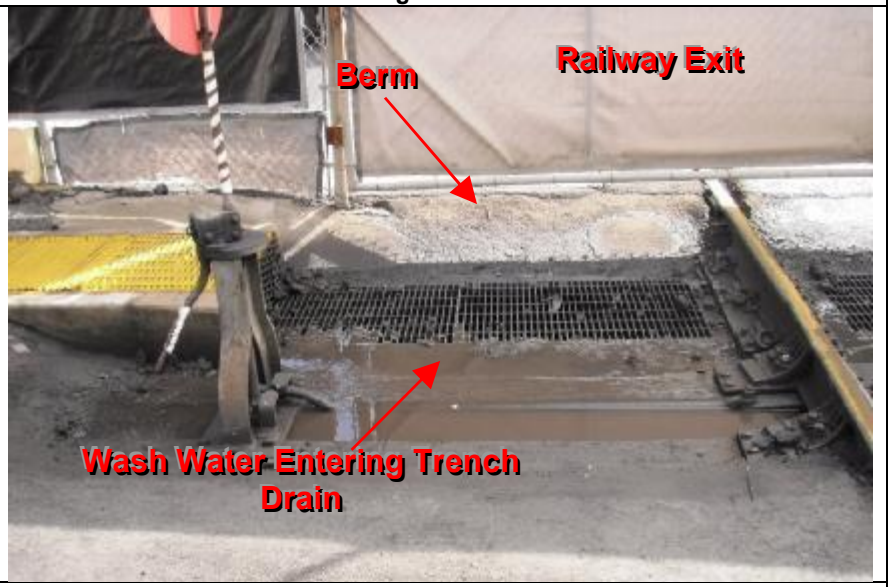
Photograph 8 – Close-up view of washing activity facing northwest.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011

Photograph 9 – View of wash water (shown in Photograph 8) flowing through a scrap iron stockpile, facing east.

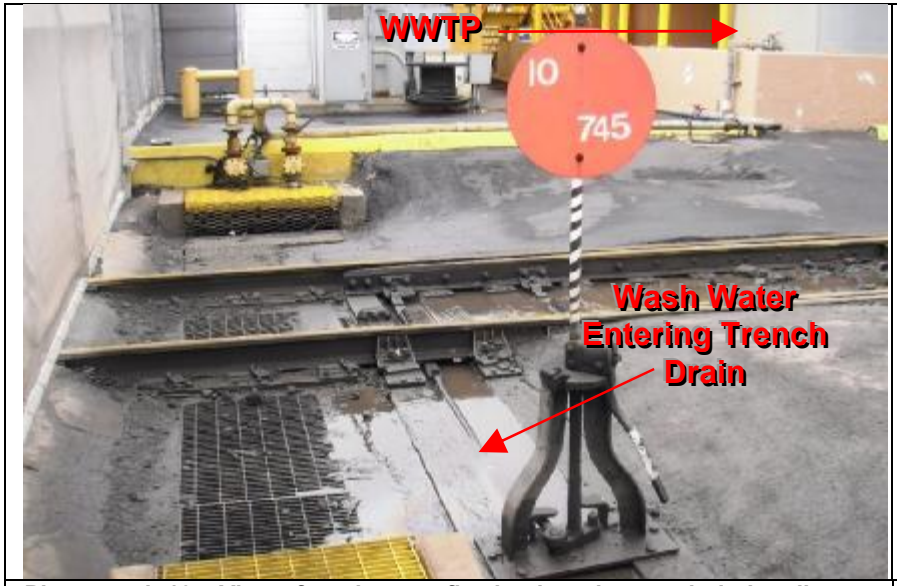
Photograph 10 – View toward the railway exit along South Indiana Street, facing southeast.

Photograph 11 – Close-up view of accumulated wash water along the tracks, facing southeast.



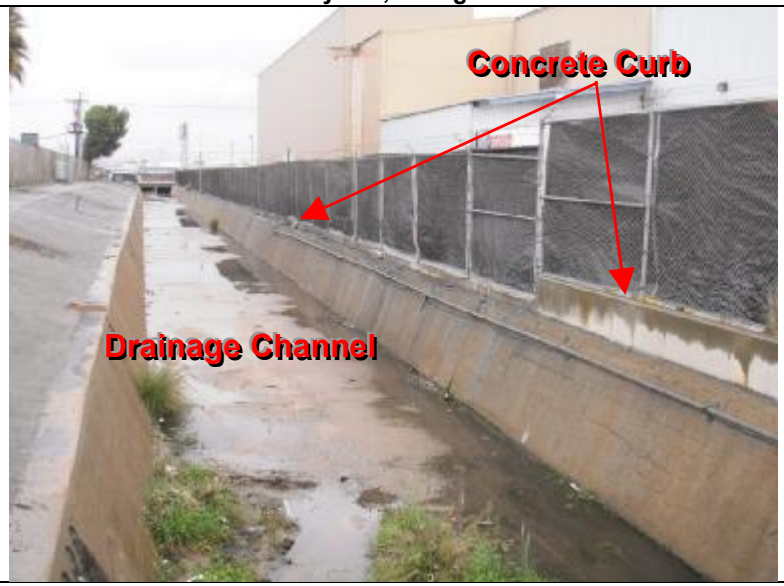
Photograph 12 – View of wash water flowing into the trench drain adjacent to the railway exit, facing southeast.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011



Photograph 13 – View of wash water flowing into the trench drain adjacent to the railway exit, facing southwest.

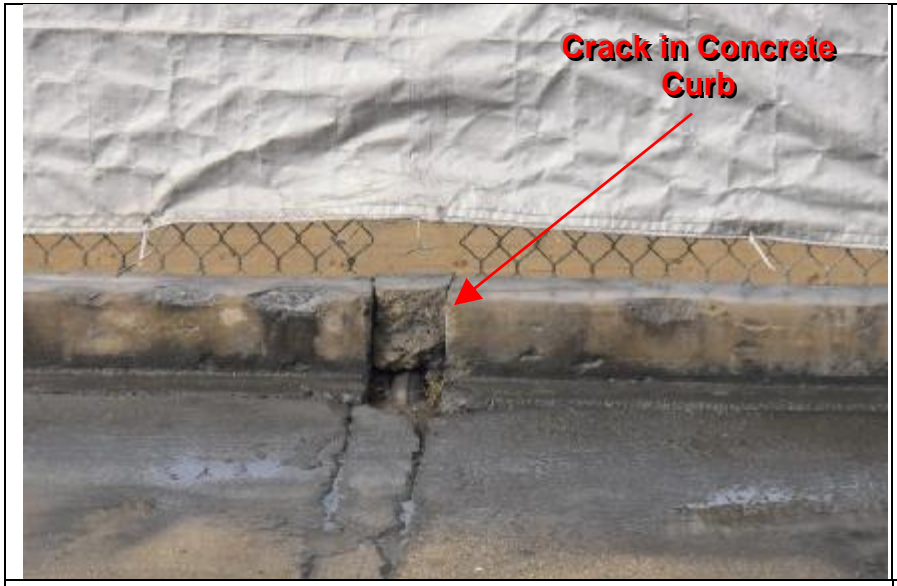
Photograph 14 – View of concrete curb from inside the North Yard, facing northwest.



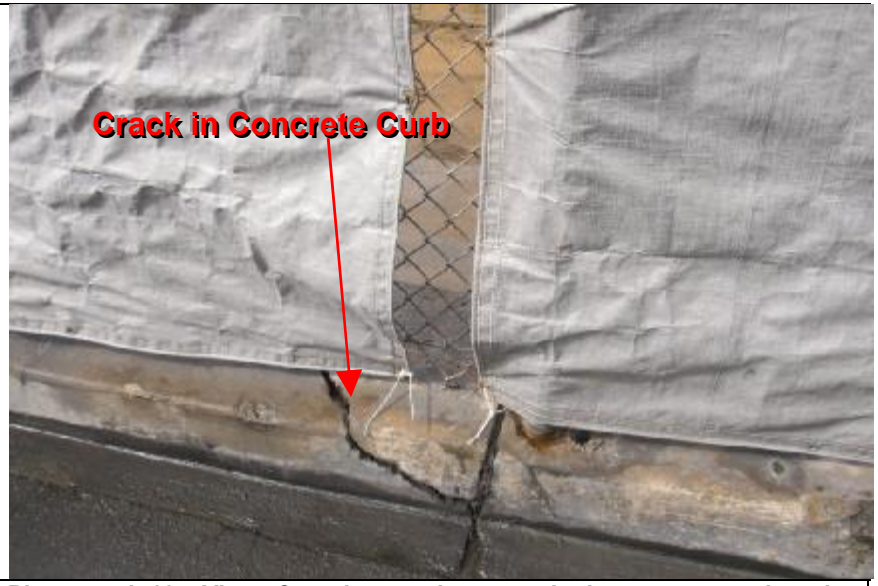
Photograph 15 – View of concrete curb from bridge over the drainage channel in the North Yard, facing north.

Photograph 16 – View of crack present in the concrete curb adjacent to the battery recycling loading dock, facing west.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011



Photograph 17 – Close-up view of crack shown in Photograph 16.



Photograph 18 – View of another crack present in the concrete curb to the north of Photograph 17, facing northwest.

Photograph 19 – View from the west side of the RMPS building facing northeast. Note truck traffic exiting the Facility.

Photograph 20 – View of 26th Street entrance/exit, facing southeast. Note presence of truck tracks and standing water.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011

Photograph 21 – View of 26th Street entrance/exit, facing east. Note truck tracks and storm water leading from the Facility.

Photograph 22 – View of 26th Street entrance/exit, facing east. Note truck tracks and storm water leading from the Facility.

Photograph 23 – Mobile equipment wash rack located to the west of the Mobile Equipment Maintenance Garage, facing south.

Photograph 24 – Close-up view of mobile equipment wash rack shown in Photograph 23.

Site Photographs	Exide Los Angeles Recycling Facility Los Angeles County, California	Photograph date: 2/16/2011

Photograph 25 – Vehicle wheel wash facility northeast of the Bandini Boulevard entrance/exit, facing west.

Photograph 26 – Close-up view of vehicle wheel wash facility shown in Photograph 25.